

**One North Lexington Avenue
White Plains, New York 10601
914.681.9500**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VALERIE A. SCHER and :
PRESTON S. SCHER, : 07 Civ. 3847 (WP4)
:
Plaintiffs, :
:
-against- : **PLAINTIFFS'**
: **DOCUMENT**
: **DEMAND**
: **TO DEFENDANTS**
:
SANDALS RESORTS :
INTERNATIONAL LTD. and :
UNIQUE VACATIONS, INC. :
:
Defendant. :
:
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S I R S:

PLEASE TAKE NOTICE that plaintiffs Valerie A. Scher and Preston S. Scher, by and through counsel, the Law Offices of Mitchell J. Baker, requests that defendants Sandals Resorts International Ltd. and Unique Vacations Inc. produce the following documents for inspection and copying in accordance with the FRCP.

1. "Relating to" as used herein shall mean both of the following:

(a) Containing, comprising, constituting, stating, setting forth, or recording, including, negating or manifesting in any way, in whole or in part, that subject; or

(b) Describing, discussing, reflecting, interpreting, identifying, concerning, contradicting, referring to, or in any way pertaining to, in whole or in part, that subject.

2. "Document" shall mean every original (and any copy of any original, or any copy which differs in any way from any original) of every writing or recording of every kind or description, whether handwritten, typed, drawn, sketched, printed or recorded by any physical, mechanical, electronic or electrical means whatsoever, including without limitation books, records, papers, pamphlets, brochures, circulars, advertisements, specifications, blueprints, maps, plates, surveys, drawings, sketches, graphs, charts, plans, correspondence, communications, telegrams, memoranda, notes, notebooks, worksheets, reports, lists, analyses, appointment books, diaries, telephone bills and tool call records, expense reports, commission statements, checkbooks, cancelled checks, receipts, contracts, agreements, written memorials of oral communications, photographs,

plaintiff now has or had access to in the past.

3. "Person" shall mean any individual, corporation, partnership or any other business entity.

4. Any and all words or phrases which refer to the masculine gender as used herein shall embrace and be read and applied as also referring to the feminine gender.

DOCUMENTS DEMANDED

1. Any statements or documents made by plaintiffs to defendants, their employees, agents, servants or contractors relating to the incident described in the complaint herein.
2. Any statements or documents made by plaintiffs to any other persons or entities relating to the incident described in the complaint herein.
3. Any reports or documents generated, produced or in the possession of defendants relating to the incident described in the complaint.
4. Any pictures or videos of the location where the incident described in the complaint occurred.
5. Any schematics or drawings or maps or plans or documents of the resort, including the walkways therein, where the incident described in the complaint occurred.

at the trial of this matter.

7. Any documents identified in the answer to Plaintiffs' First Set of
Interrogatories to Defendants.

Dated: White Plains, New York
July 12, 2007

LAW OFFICES OF MITCHELL J. BAKER
Attorneys for Plaintiff

By: 

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